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REMARKS

Applicant wishes to thank the Examiner for the detailed remarks. Applicant request reconsideration based upon the following remarks.

Claims 1,2,4-7,11-13,17,20,25-27 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Martin* (5,038,589) in view of *Mall* (2021241). The Examiner's proposed combination is between a lock and a quick detach coupling for a grinding wheel. "In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned." *In re Oetiker*, 977 F.2d 1443, 1446, 24 USPQ2d 1443, 1445 (Fed. Cir. 1992). *Mall* is not Applicant's field of endeavor and is not reasonably pertinent to the particular problem that the applicant has solved.

Mall is directed to providing a quick change between various hand tools (such as the illustrated grinding wheel) and a flexible shaft. One would *never* look to the field of quick change hand tool to provide a secure mount for a lock as the premier underlying desire for lock cylinder mounting is tamper resistance. That is, the lock cylinder, although being replaceable, must be completely tamper resistant once mounted to prevent unauthorized access through tampering to provide the desired security necessary for a lock. The quick change between various hand tools is not in the least concerned with tamper resistance in the mounting of the various tools. In fact, the desire is that the tool coupling be rapidly and easily disengaged, i.e., easily tampered with. Thus, *Martin* (5,038,589) is not analogous art to *Mall* or to Applicant's lock invention and the proposed combination of *Martin* (5,038,589) in view of *Mall* is improper.

Claims 1,2,4-7,11-13,17,20,25-27 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Martin* (5,038,589) in view of *Mall* (2021241). *Martin* discloses that the clip has two parallel, spaced-apart prongs 42 which have a diameter slightly less than that of the spaced-

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apart bores 36 and are sufficiently spaced-apart to be received within the spaced-apart bores. [Col. 3; lines 34-39] As admitted, by the Examiner, *Mall* discloses a retainer engagement feature formed as angled abutments 50 which the retainer legs flex over upon initial insertion and which ultimately fit into recesses 52 in the retainer legs.

Even if the combination were properly made, there are differences between the claimed invention and the teachings of the cited references so that the combination does not meet the limitations of Applicant's claims. Claims 1, 11, and 17, recite a retainer engageable with said housing retainer groove at an angle not perpendicular to said axis to initially pass over said retainer engagement feature extending from the housing during insertion of the retainer into the housing retainer groove. *Martin* fails to disclose insertion at an angle to pass over a retainer engagement feature, as the only retainer engagement feature disclosed by *Martin* is lid 46 which is mounted on top of the clip after insertion of the clip. *Mall* does not correct this deficiency even if *Martin* were properly modified by *Mall*. *Mall* discloses only slots 38,40 which are perpendicular to the collar 28 (as represented by the perpendicular section 2-2). Applicant agrees with the Examiner that *Mall* discloses retainer legs that flex outward upon initial insertion. But this flexing occurs in the plane defined by the plane 2-2 as limited by the slots 38, 40. The *Mall* retainer 36 is inserted in slots 28, 40 perpendicular to the axis. Even if the combination were proper, *Mall* does not disclose a retainer engageable with said housing retainer groove at an angle not perpendicular to said axis to initially pass over said retainer engagement feature extending from the housing during insertion of the retainer into the housing retainer groove.

The proposed combination also does not disclose or suggest mounting the retainer to initially pass over said retainer engagement feature extending from the housing during insertion of the retainer into the housing retainer groove. That is, there is no retainer engagement feature extending from the housing disclose by either *Martin*, *Mall* or a combination thereof. The amended claims are properly allowable.

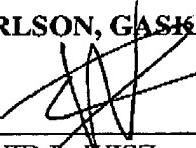
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Claims 8 and 14 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Martin* (5,038,589) in view of *Mall* (2021241) and further in view of *Dauenbaugh* or *Myers*.

Applicant respectfully traverses these rejections as there is absolutely no teaching, suggestion, or motivation to modify *Martin* in view of *Mall* and further in view of *Dauenbaugh* or *Myers* as proposed. Simply, there is no motivation to combine the apertures of *Dauenbaugh* or *Myers* with *Martin* in view of *Mall*, because *Martin* in view of *Mall* discloses a housing including a retainer engagement feature. That is, there is no motivation to locate an aperture in the retainer of *Martin* or *Mall* because it would serve no purpose. That is there is no motivation to provide an aperture as proposed by the Examiner because there is no retainer engagement feature on the housing of *Martin* or *Mall*. The only motivation to make the combination as proposed is by following the knowledge disclosed within the present invention. This is impermissible usage of hindsight in an attempt to re-create Applicant's device. Accordingly, claims 8 and 14 are properly allowable.

Applicant respectfully submits that this case is in condition for allowance. If the Examiner believes that a teleconference will facilitate moving this case forward to being issued, Applicant's representative can be contacted at the number indicated below.

Respectfully Submitted,
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